

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

| | | |
|----------------------------------|---|-----------------------|
| KEILEE FANT, ROELIF CARTER, |) | |
| ALLISON NELSON, HERBERT NELSON, |) | |
| JR., ALFRED MORRIS, ANTHONY |) | |
| KIMBLE, DONYALE THOMAS, |) | |
| SHAMEIKA MORRIS, DANIEL JENKINS, |) | |
| RONNIE TUCKER, TONYA DEBERRY, ET |) | |
| AL., |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| vs. |) | Case No.: 4:15-cv-253 |
| |) | |
| THE CITY OF FERGUSON, |) | |
| |) | JURY TRIAL DEMANDED |
| Defendant. |) | |

***DEFENDANT'S MOTION FOR LEAVE OF COURT TO FILE ITS
MEMORANDUM OF LAW IN SUPPORT OF THEIR MOTION TO
PARTIALLY DISMISS PLAINTIFFS' FIRST AMENDED
COMPLAINT IN EXCESS OF FIFTEEN PAGES***

COMES NOW Defendant, the City of Ferguson, by and through counsel, and pursuant to Local Rule 7 – 4.01(D), respectfully move this Court to grant leave and allow Defendant to file its Motion to Partially Dismiss in excess of fifteen (15) pages. In Support of its Motion, Defendants represent to the Court Plaintiffs have filed a fifty-nine page, 247 paragraph First Amended Complaint ranging through the issues of distinction between the Ferguson Municipal Court and the City of Ferguson. The Motion also will address issues of Article III standing, prudential standing, elements of equitable relief, ripeness, and concerns regarding federalism.

WHEREFORE, Defendant respectfully requests this Court GRANT its Motion for Leave of Court in a manner consistent with the above, and for such other and further relief as the Court deems proper.

/s/Peter J. Dunne

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I hereby certify that a copy of the foregoing filed electronically with the Clerk of the Court this 21st day of April, 2016, to be served by operation of the Court's electronic filing system upon the following or U.S. mail for parties not registered with CM/ECF:

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